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June 21, 2019

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: *Reliability and Continuity of Communications Networks, Including Broadband Technology*, PS Docket No. 11-60

Dear Ms. Dortch:

On May 20, 2019, the Communications Workers of America (“CWA”) filed reply comments in this proceeding that misstate what happened with Verizon’s disaster recovery efforts in the Florida Panhandle region after Hurricane Michael in October 2018. As we have explained, we have learned from the challenges we faced in that recovery effort and will apply those lessons to improve disaster recovery efforts going forward. But CWA’s recommendations miss the point, as they would do little to actually help those that matter to us the most: our customers.

Verizon supports the Commission’s initiative to assess the effectiveness of the Wireless Resiliency Cooperative Framework and industry’s network reliability and service restoration practices. And we have already provided a number of constructive suggestions on how to improve them. Unfortunately, CWA makes many inaccurate, misleading, or unsupported assertions regarding Verizon’s disaster recovery efforts. But CWA’s narrative does not dispute Verizon’s basic explanation for the service restoration challenges we faced in the Florida Panhandle, which we already have explained to the Commission and others. Those reasons are straightforward: Michael was the first recorded Category 5 hurricane to hit the area; aerial fiber (which is not unique to Verizon in the area)¹ is more vulnerable to wind damage in areas like Panama City; much of our fiber backhaul in Panama City was aerial and damaged during the storm; and the clean-up activities of other parties, including electric utilities, municipal and other clean-up crews, and homeowners, delayed service restoration by continually damaging fiber

¹ AT&T noted to the Commission that it “experienced some damage to just about every aerial section of fiber” in Bay County and Gulf County, Florida. AT&T Letter in PS Docket Nos. 11-60 and 18-339, Feb. 28, 2019.

even as we aggressively repaired it.² But as we have stated to the Commission already, the extended period after the storm during which we were unable to restore service did not meet our expectations. And Verizon is already incorporating our experience into internal policies and practices, including a reassessment of the optimal mix of aerial and underground fiber in coastal areas and increased use of satellite-based temporary facilities.

To set the record straight, below we address the most significant issues raised in CWA's filing.

Public Awareness. CWA inaccurately asserts that we only provided outage-related information to the public in response to "public reprimands" and "under pressure." Service providers must balance a number of factors in communicating to the public about post-disaster network damage and service restoration efforts. The information should be useful to consumers like, for example, the location of charging stations, particular areas where service has been restored, or where deployable facilities are installed for first responders. But providers should not overload the public and state and local governments with so much unverified information that it becomes confusing, or less reliable or useful. Beginning with Hurricane Florence and continuing through Hurricane Michael, last year's California wildfires, and recent tornadoes and flooding in the Midwest, Verizon has timely provided online information about its service restoration efforts. For Hurricane Michael, providing useful information took more time than we wanted because limited access to the area made the extent of the damage to our network unclear. And Verizon communicated with first responders and state and federal emergency response agencies, including the Commission, on an ongoing basis after Hurricane Michael about our recovery efforts. We communicated multiple times a day with state and local leaders with progress reports, and we established single points of contacts with key leaders at every level of government to ensure consistent and timely communication. And we have been equally candid with the Commission about the challenges we faced and where we did not meet our own expectations.

Verizon's Business Relationships. CWA's principal theme throughout its filing appears to be that Verizon's business relationship with its fiber backhaul provider Uniti in the area hindered our ability to restore service there.³ If that were so, that relationship would have been a factor everywhere that provider serves Verizon in the area affected by Hurricane Michael. In fact, Uniti provides its facilities and services to Verizon in many other counties where we lost service to a significant number of cell sites, including Leon County (where Tallahassee is located), but were able to restore most services in those markets within just a few days after the storm passed. The challenges we faced in Bay County and Gulf County to repair and maintain fiber backhaul once repaired were thus unique to the devastation and access challenges in those counties, and had nothing to do with our business relationship to our fiber provider there.

² Uniti Fiber informed the Commission that electrical utilities damaged its working fiber facilities "at least 33 times across the affected region." Uniti Fiber Letter in PS Docket No. 18-339, Jan. 3, 2019.

³ CWA at 7-9.

Credentialing/Facilities Access. CWA alleges that Uniti personnel were unable to access its equipment located at AT&T's facilities due to lack of "proper credentials."⁴ As a threshold matter, it is unclear whether CWA refers to "credentialing" as used in the disaster recovery context (whereby communications providers, government, utilities and others can reliably identify other critical infrastructure personnel), or the standard security and access procedures that are permitted under the Commission's collocation regulations.⁵ In either case, CWA states that Uniti was "*initially unable* to gain entrance to AT&T's facilities" to access its collocated facilities.⁶ While CWA does not provide the time or location of the alleged incident, CWA concedes that the problem was only temporary. And that a critical infrastructure provider faced a temporary credentialing or other access issue in the wake of a devastating Category 5 hurricane is unremarkable.

CWA's recommendations for Commission regulation in this area⁷ would impede on FEMA's responsibilities, those of state and local emergency management agencies, and state and local oversight and regulation of construction practices. More problematic for the Commission's purposes, though, they would undermine service providers' ability to quickly undertake the initial triage measures necessary to restore service after major disasters. And such regulations are unnecessary in any event. In coordination with FEMA and the DHS National Coordinating Center for Communications (NCC), Verizon already directs its employees and contractors to maintain all appropriate identification with them when performing disaster recovery responsibilities on Verizon's behalf. It is our standard practice to provide contractors with access letters identifying them and their role in assisting with preparation, repair, recovery or restoration of service. Where there are issues or questions about a contractor's credentials—as almost invariably happens after a major disaster—we maintain 24/7 toll-free and local points of contact to resolve any issues that arise. Other wireless providers have similar practices and policies.

Coordination Responsibility. CWA alleges that Verizon relied on Uniti "to coordinate its recovery work."⁸ Nothing could be further from the truth. Verizon coordinated its Hurricane Michael recovery efforts through: internal Emergency Operations Centers (EOCs) in Jacksonville and Youngstown; regional management-level personnel seconded to state- and locally-administered EOCs and to field operations; active engagement with government and industry stakeholders at the NCC; and regional crisis and Global Event Management operations centers at the headquarters level.

⁴ CWA at 7.

⁵ See 47 C.F.R. § 51.323(i).

⁶ CWA at 7 (emphasis added).

⁷ CWA at 13-15.

⁸ CWA at 9.

Service Restoration Efforts. CWA also second-guesses the adequacy of Verizon's and its contractor's network repair efforts through unsupported speculation.⁹

- **Personnel Deployment.** In the immediate aftermath of the storm, when it had passed into Georgia, our backhaul network remained largely operational despite the damage. To repair the parts of the network affected by the storm itself, Uniti crews initially worked 24 hours per day beginning before dawn on October 11, 2018 after wind speeds fell below 45 mph. It ultimately had hundreds of crew members and approximately 25 bucket trucks. During the course of our service restoration effort we also had multiple executives on the ground in the Panhandle meeting with customers and giving updates to the media, including Chief Networking Engineer and Head of Wireless Networks Nicola Palmer, Executive Vice President of Wireless Operations Tami Erwin, Executive Vice President of Global Network Field Operations and Assurance David Small and Market President Krista Bourne. Additionally, Ms. Palmer met with the CEOs of Gulf Power and Uniti to discuss ways to quickly combine resources to expedite restoration, including embedding our crews with the power company crews to restore new fiber cuts as they happened.
- **Fiber Repairs.** CWA questions whether the work of Verizon's and Uniti's network recovery personnel met relevant technical and safety standards.¹⁰ While CWA does not provide specific dates and locations, as we have explained to the Commission during the first week after the storm Gulf Power replaced thousands of utility poles. And access to rights of way in many sections of Panama City was nonexistent. Rather than waiting for poles to be replaced—which would have delayed service restoration even further—Uniti crews repaired fiber as quickly as possible and were compelled to make on-the-ground decisions about how to place it in the interim, including placement on the ground and in trees in some places.

Business Continuity/Disaster Recovery Program. CWA questions whether Verizon's Business Continuity/Disaster Recovery (BC/DR) program and related training adequately accounts for the role of contractors and subcontractors. Our BC/DR program is both comprehensive and nimble. Consistent with industry practices, Verizon's training efforts generally focus on its own business operations and, thus, our own employees. Vendors involved in our operations are included in those efforts, but as Verizon is not a construction company we unsurprisingly use contractors for those functions—and pay them a premium for their expertise. CWA's recommendation that wireless providers be required to provide permitting agencies an "emergency workforce deployment plan"¹¹ is paperwork for its own sake that is both unwieldy and unnecessary. Event-specific coordination with state and local emergency management agencies is the appropriate practice. Documents filed with hundreds if not thousands of

⁹ CWA at 9.

¹⁰ CWA at 12.

¹¹ CWA at 15.

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permitting agencies across the country, as CWA recommends, would require service providers to micromanage the business activities of their contractors—and would quickly become outdated given the unique or localized impact of a disaster and as service providers make ongoing improvements in their overall BC/DR policies.

Other Alleged Incidents. CWA alleges that incidents in Wisconsin and California relating to the deployment of fiber backhaul for Verizon's wireless network are relevant to its recommendations.¹² While these matters are the subject of litigation, we disagree with CWA's characterizations of them. Both incidents involved third party construction contractors who, as noted above, are hired because they have expertise in those construction activities.

The Commission should carefully assess the effectiveness of the Wireless Resiliency Cooperative Framework. And engaging with a wide range of stakeholders in this and related efforts, such as the Commission's Broadband Deployment Advisory Committee, can contribute to that effort. But Verizon's experience after Hurricane Michael does not provide a basis for CWA's recommendations, which at worst could jeopardize wireless providers' ability to react quickly and flexibly to a disaster event's unique circumstances.

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's rules. Please contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert L. Morse". The signature is fluid and cursive, with the first name "Robert" and last name "Morse" clearly legible.

¹² CWA at 10-11.